PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Rinker Boat Company, Inc.
300 West Chicago Street
Syracuse, Indiana 46567

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7516-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass boat building and repairing operation.

Responsible Official:	Mr. Kim Slocum
Source Address:	300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address:	300 West Chicago Street, Syracuse, Indiana 46567
SIC Code:	3732
County Location:	Kosciusko
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) one (1) fiberglass layup operation (ID No. P2-3), located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2);

(2) one (1) fiberglass layup operation (ID No. P3-2), located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S3-1 and S3-2);

(3) one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;

(4) one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;

(5) one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour;

(6) one (1) foam blowing operation (ID No. P2-2), located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2); and

(7) one (1) woodworking operation (ID No. P1-2), located in Plant 1, consisting of two (2) routers, three (3) table saws, three (3) chop saws, one (1) panel saw, and one (1) belt sander, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor), in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1)	one (1) fiberglass layup operation (ID No. P2-3), located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2);
(2)	one (1) fiberglass layup operation (ID No. P3-2), located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S3-1 and S3-2);
(3)	one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
(4)	one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;
(5)	one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour; and
(6)	one (1) foam blowing operation (ID No. P2-2), located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Total VOC usage in each of the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall be limited to less than 25.0 tons per 12 consecutive month period, rolled on a monthly basis. This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the assembly glue application area and the flotation foam blowing operation. Compliance with this limit makes 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable.

(b) Pursuant to CP-085-2400-00031, issued January 29, 1993, the Best Available Control Technology (BACT) for the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) is to comply with the following work practice: solvent used to clean up chopper guns and other tools shall be discharged into containers, and these containers shall be kept covered at all times other than when solvent is discharged into them.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in each of the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall be limited such that the potential to emit (PTE) VOC from these operations shall be limited to 246.2 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of 249.0 tons per 365 consecutive day period (includes 246.2 tons per year from the significant activities and 2.8 tons per year from the insignificant activities). Compliance with this limit shall be determined based upon the total VOC usage in the upholstery glue application area, the two (2) assembly glue application areas, and the foam blowing operation, and the following criteria for the two (2) fiberglass layup operations:

(a) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Stack Height

Pursuant to CP-085-2400-00031, issued January 29, 1993, the following shall apply:

(a) The two (2) stacks exhausting from Plant 2 (ID Nos. S2-1 and S2-2) shall have a diameter of 2 feet and a minimum stack height of 25 feet above ground level and shall be located on the west side of Plant 2. All exhaust from the fiberglass layup operation (ID No. P2-3) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

(b) The two (2) stacks exhausting from Plant 3 (ID Nos. S3-1 and S3-2) shall have a diameter of 2 feet and a minimum stack height of 39 feet above ground level and shall be located on the west side of Plant 3. All exhaust from the fiberglass layup operation (ID No. P3-2) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM overspray from the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), and the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass layup booth stacks (S2-1, S2-2, S3-1, and S3-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) For Plants 2 and 3 the following records shall be maintained:

(i) A log of the number of boats produced in Plants 2 and 3 on a daily basis;

(ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(iii) The cleanup solvent usage for each month;

(iv) The total VOC usage for each month; and

(v) The weight of VOCs emitted for each compliance period.

(2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), the amount and VOC content of each material and solvent used shall be recorded on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

(7)	one (1) woodworking operation (ID No. P1-2), located in Plant 1, consisting of two (2) routers, three (3) table saws, three (3) chop saws, one (1) panel saw, and one (1) belt sander, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking operation shall not exceed 2.4 pounds per hour when operating at a process weight rate of 890 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the woodworking equipment is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking operation cyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking operation cyclone stack exhaust.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031
Facility: the assembly glue application area (ID No. P2-1)
Parameter: VOC usage
Limit: Total VOC usage in the assembly glue application area (ID No. P2-1) shall be limited to less than 25.0 tons per 12 consecutive month period, rolled on a monthly basis. This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the assembly glue application area.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month (tons)	VOC Emissions Previous 11 Months (tons)	12 Month Total VOC Emissions (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031
Facility: the flotation foam blowing operation (ID No. P2-2)
Parameter: VOC usage
Limit: Total VOC usage in the flotation foam blowing operation (ID No. P2-2) shall be limited to less than 25.0 tons per 12 consecutive month period, rolled on a monthly basis. This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the flotation foam blowing operation.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031
Facility: the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the three (3) glue application areas (ID Nos. P1-1, P2-1 and P3-1), and the foam blowing operation (ID No. P2-2)
Parameter: VOC emissions
Limit: Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in each of the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall be limited such that the potential to emit (PTE) VOC from these operations shall be limited to 246.2 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of 249.0 tons per 365 consecutive day period.

Month: _____ **Year:** _____

Day	VOC Emissions This Day (tons)	VOC Emissions Last 365 Day Period (tons)	Day	VOC Emissions This Day (tons)	VOC Emissions Last 365 Day Period (tons)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			Total		

9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	**Rinker Boat Company, Inc.**
Source Location:	**300 West Chicago Street, Syracuse, Indiana 46567**
County:	**Kosciusko**
SIC Code:	**3732**
Operation Permit No.:	**T085-7516-00031**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Rinker Boat Company, Inc. relating to the operation of a stationary fiberglass boat building and repairing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) one (1) fiberglass layup operation (ID No. P2-3), located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2); and

(2) one (1) fiberglass layup operation (ID No. P3-2), located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S3-1 and S3-2).

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(1) one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a high pressure low volume (HPLV) spray application system, coating a maximum of 1.0 set of boat parts per hour;

(2) one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an HPLV spray application system, coating a maximum of 1.5 sets of boat parts per hour;

(3) one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an HPLV spray application system, coating a maximum of 1.0 set of boat parts per hour;

(4) one (1) foam blowing operation (ID No. P2-2), located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2);

(5) one (1) fiberglass layup operation (ID No. P4-1), located in Plant 4, utilizing a resin spray layup or flow coating application system, producing a maximum of 1.4 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (ID Nos. V4-1, V4-2, V4-3, and V4-4); and

(6) one (1) woodworking operation (ID No. P1-2), located in Plant 1, consisting of two (2) routers, three (3) table saws, three (3) chop saws, one (1) panel saw, and one (1) belt sander, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted facilities are reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour (heaters with a total heat input 16.625 million Btu per hour);

(2) a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(3) a petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(4) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(5) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(6) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(7) cleaners and solvents characterized as follows:

A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38ºC (100ºF) or;

B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20ºC (68ºF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(8) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(9) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(10) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(11) trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;

(12) paved and unpaved roads and parking lots with public access;

(13) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
(14) other emergency equipment as follows: stationary fire pumps;
(15) a laboratory as defined in 326 IAC 2-7-1(20)(C);
(16) Hi Low Paste Wax and Edge Wax used as mold release agents in fiberglass layup operations with potential VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day; and
(17) grinding booths in Plants 2 and 3 for trimming/grinding boats after removed from molds with potential PM emissions less than five (5) pounds per hour or twenty five (25) pounds per day.

Existing Approvals

The source has been operating under the following approvals:

(1) CP 085-2400-00031, issued January 29, 1993.

Source Definition

This stationary fiberglass boat building and repairing operation consists of four (4) plants:

(1) Plants 1 through 4 are all located at 300 West Chicago Street, Syracuse, Indiana 46567.

Since the four (4) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

(1) one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a high pressure low volume (HPLV) spray application system, coating a maximum of 1 set of boat parts per hour;
(2) one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an HPLV spray application system, coating a maximum of 1 set of boat parts per hour;
(3) one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an HPLV spray application system, coating a maximum of 1.5 sets of boat parts per hour;
(4) one (1) woodworking operation (ID No. P1-2), located in Plant 1, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2);
(5) one (1) foam blowing operation (ID No. P2-2), located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2); and

(6) one (1) fiberglass layup operation (ID No. P4-1), located in Plant 4, utilizing a resin spray layup or flow coating application system, producing a maximum of 1.4 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (ID Nos. V4-1, V4-2, V4-3, and V4-4).

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional information was received on October 17, 1997.

A notice of completeness letter was mailed to Rinker Boat Company, Inc. on January 13, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	less than 10
Methylene Chloride	less than 10
Styrene	greater than 10
Methyl Methacrylate	less than 10
MDI	less than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in the Indiana Rule) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 actual emission data provided by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	10.5
SO_2	0.0
VOC	138.0
CO	0.0
HAP (Methylene Chloride)	21.4
HAP (Propylene Oxide)*	0.1
HAP (Xylene)*	3.6
HAP (MDI)*	3.8
HAP (Styrene)*	91.2
HAP (Methyl Methacrylate)*	11.7
NO_x	0.0

* Also included in VOC total emissions

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Fiberglass Layup, Adhesive Application, and Foam Blowing(1)	72.4	72.4	0.0	246.2	0.0	0.0	215.3
Woodworking(1)	49.3	49.3	0.0	0.0	0.0	0.0	0.0
Total Emissions(2)	122.6	122.6	0.0	249.0	1.5	7.3	215.3

(1) The unpermitted fiberglass layup facility (ID No. P4-1), the unpermitted adhesive application operations (ID Nos. P1-1, P2-1, and P3-1), the unpermitted foam blowing operation (ID No. P2-2), and the unpermitted woodworking operation (ID No. P1-2) are being reviewed under the ENSR process. Potential VOC emissions from the unpermitted facilities are greater than 25 tons per year, therefore, these facilities would have required a permit. The ENSR process will satisfy the requirements of the construction permit rules.

(2) Includes emissions from Insignificant Activities.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12)(40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD) because the source will limit source wide VOC emissions to 249.0 tons per 365 consecutive day period and PM and PM-10 emissions from the fiberglass layup operations will be controlled using dry filters so that source wide PM and PM-10 emissions are less than 249.0 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the fiberglass layup operations in Plants 2 and 3 (ID Nos. P2-3 and P3-2) have a PTE of more than 10 tons per year of a single HAP and more than 25 tons per year of total HAPs, these facilities were constructed and permitted before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-1-3.4. The previously unpermitted facilities at the source (ID Nos. P1-1, P2-1, P3-1, P1-2, P2-2, and P4-1) each have a PTE of less than 10 tons per year of a single HAP and less than 25 tons per year of total HAPs and each was constructed before July 27, 1997, therefore, these facilities are not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the woodworking operation (ID No. P1-2) shall be limited to 2.4 pounds per hour (10.4 tons per year). This emission limit is based on a process weight rate of 890 pounds per hour and the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour
= 0.445 tons per hour

$E = 4.10\ (0.445)^{0.67}$

E = 2.38 pounds per hour (10.44 tons per year)

Potential controlled emissions from the woodworking operation (ID No. P1-2) are 8.2 tons per year, therefore, the woodworking operation is in compliance with 326 IAC 6-3-2.

The particulate matter (PM) overspray from each of the fiberglass layup operations (ID Nos. P2-3, P3-2, and P4-1) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Facilities constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year are subject to 326 IAC 8-1-6.

(a) The two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) are subject to the provisions of 326 IAC 8-1-6 since they were constructed after January 1, 1980, and have potential VOC emissions greater than 25 tons per year. Pursuant to CP-085-2400-00031, issued January 29, 1993, the Best Available Control Technology (BACT) for the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) has been determined to be no add-on VOC control with the following work practice: solvent used to clean up chopper guns and other tools shall be discharged into containers, and that these containers shall be kept covered at all times other than when solvent is discharged into them.

(b) The assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) are also subject to the provisions of 326 IAC 8-1-6 since each was constructed after January 1, 1980, and each has potential VOC emissions greater than 25 tons per year. Rinker Boat Company, Inc. will limit VOC usage in each of the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) to 22 tons per 12 consecutive month period, rolled on a monthly basis, therefore, the requirements of 326 IAC 8-1-6 will not apply.

(c) Potential VOC emissions from one (1) of the fiberglass spray layup operations (ID No. P4-1), the upholstery glue application area (ID No. P1-1), and the assembly glue application area (ID No. P3-1) are each less than 25 tons per year, therefore, 326 IAC 8-1-6 will not apply to these facilities.

No other 326 IAC Article 8 rules apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) The assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) have applicable compliance monitoring conditions as specified below:

(a) Total VOC usage in each of the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall not exceed 22.0 tons per 12 consecutive month period, rolled on a monthly basis;

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage for each of the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2).

These monitoring conditions are necessary to render the requirements of 326 IAC 8-1-6 (BACT) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

(2) The fiberglass layup operation (ID No. P2-3), located in Plant 2, the fiberglass layup operation (ID No. P3-2), located in Plant 3, the fiberglass layup operation (ID No. P4-1), located in Plant 4, the upholstery glue application area (ID No. P1-1), located in Plant 1, the assembly glue application area (ID No. P2-1), located in Plant 2, the assembly glue application area (ID No. P3-1), located in Plant 3, and the foam blowing operation (ID No. P2-2), located in Plant 2, have applicable compliance monitoring conditions as specified below:

(a) Total emissions of VOC in each of the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P4-1), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall not exceed 246.2 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of 249.0 tons per 365 consecutive day period (includes 246.2 tons per year from the significant activities and 2.8 tons per year from the insignificant activities). This emission limit is based on 35% flash off for non vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup in the fiberglass layup operations;

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total daily VOC emissions for each of the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P4-1), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2).

These monitoring conditions are necessary to render the requirements of 326 IAC 2-2 (PSD) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

(3) The woodworking operation (ID No. P1-2) has applicable compliance monitoring conditions as specified below:

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the woodworking operation (ID No. P1-2) shall be limited to 2.4 pounds per hour (10.4 tons per year).

(b) Daily visible emissions notations of the woodworking operation cyclone stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the cyclone for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

(b) See attached calculations for detailed air toxic calculations (page 5 of 6, TSD Appendix A).

(c) Pursuant to CP-085-2400-00031, issued January 29, 1993, the following shall apply to the four (4) stacks (ID Nos. S2-1, S2-2, S3-1, and S3-2) for the two (2) fiberglass layup operations' (ID Nos. P2-3 and P3-2) exhaust:

(1) The two (2) stacks exhausting from Plant 2 (ID Nos. S2-1 and S2-2) shall have a diameter of 2 feet and a minimum stack height of 25 feet above ground level and shall be located on the west side of Plant 2. All exhaust from the fiberglass layup operation (ID No. P2-3) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

(2) The two (2) stacks exhausting from Plant 3 (ID Nos. S3-1 and S3-2) shall have a diameter of 2 feet and a minimum stack height of 39 feet above ground level and shall be located on the west side of Plant 3. All exhaust from the fiberglass layup operation (ID No. P3-2) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

Conclusion

The operation of this stationary fiberglass boat building and repairing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T085-7516-00031.**

Appendix A: Emission Calculations

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Operation Permit No.: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 9, 1999

Total Potential To Emit (tons/year)

	Emissions Generating Activity			
Pollutant	Adhesive Application, Fiberglass Layup, and Foam Blowing	Woodworking	Insignificant Activities	**TOTAL**
PM	419.55	8.21	0.87	428.6
PM10	419.55	8.21	0.87	428.6
SO2	0.00	0.00	0.04	0.0
NOx	0.00	0.00	7.28	7.3
VOC	1088.44	0.00	2.77	1091.2
CO	0.00	0.00	1.53	1.5
total HAPs	155.93	0.00	0.00	155.9
worst case single HAP	127.86	0.00	0.00	127.9

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion and mold release usage in fiberglass layup operations.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Controlled Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Adhesive Application, Fiberglass Layup, and Foam Blowing	Woodworking	Insignificant Activities	**TOTAL**
PM	11.28	8.21	0.87	20.4
PM10	11.28	8.21	0.87	20.4
SO2	0.00	0.00	0.04	0.0
NOx	0.00	0.00	7.28	7.3
VOC	246.23	0.00	2.77	249.0
CO	0.00	0.00	1.53	1.5
total HAPs	155.93	0.00	0.00	155.9
worst case single HAP	127.86	0.00	0.00	127.9

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion and mold release usage in fiberglass layup operations.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration
Note: At a source wide material usage limitation of 22.62%, source wide VOC emissions are limited to 249.0 tons per year, therefore, 326 IAC 2-2 (PSD) does not apply.

Appendix A: Emission Calculations
VOC and Particulate
From Adhesive Application

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Operation Permit No.: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 26, 1998

State Potential Emissions (uncontrolled):

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Con-Bond 2725T1	P1-1	6.80	54.60%	0.00%	54.60%	0.00%	12.40%	0.546	1.00	3.7	3.71	2.03	48.63	8.87	1.84	39.92	75.00%
Titeco TTCGP1-40	P1-1	7.70	76.00%	0.00%	76.00%	0.00%	24.00%	0.540	1.00	5.9	5.85	3.16	75.84	13.84	1.09	32.51	75.00%
Con-Bond 2725T1	P2-1	6.80	54.60%	0.00%	54.60%	0.00%	12.40%	1.910	1.50	3.7	3.71	10.64	255.25	46.58	9.68	39.92	75.00%
Con-Bond 2725T1	P3-1	6.80	54.60%	0.00%	54.60%	0.00%	12.40%	0.728	1.00	3.7	3.71	2.70	64.83	11.83	2.46	39.92	75.00%
Total State Potential Emissions:												**16.50**	**395.92**	**72.26**	**13.99**		

Federal Potential Emissions (controlled):

	P2-1 Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Federal Potential Emissions:	51.52%	0.00%	0.00%	**11.34**	**272.17**	**49.67**	**9.29**

Note:
At a 51.52% material usage limitation for P2-1, VOC emissions are limited to 24 tons per year, therefore, 326 IAC 8-1-6 (BACT) does not apply.

Methodology:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Fiberglass Processes

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Operation Permit No.: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 9, 1999

State Potential Emissions (uncontrolled):

Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Emission Factor % of Resin/ Gel Coat Weight	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
P2-3																	
Gray Gel Coat	9.97	42.21%	0.00%	42.21%	0.00%	57.79%	24.20%	1.4551	1.50	4.2	4.21	5.27	126.39	23.07	13.77	9.71	75.00%
White Gel Coat	10.44	45.60%	0.00%	45.60%	0.00%	54.40%	27.70%	5.4565	1.50	4.8	4.76	23.67	568.06	103.67	50.90	11.67	75.00%
Resin	9.10	35.00%	0.00%	35.00%	0.00%	60.00%	7.00%	95.3846	1.50	3.2	3.19	91.14	2187.36	399.19	185.34	5.59	95.00%
Super Flush	8.86	100.00%	0.00%	100.00%	0.00%	0.00%	N/A	0.7275	1.50	8.9	8.86	9.67	232.05	42.35	0.00	N/A	75.00%
P3-2																	
White Gel Coat	10.44	45.60%	0.00%	45.60%	0.00%	54.40%	27.70%	9.8213	1.00	4.8	4.76	28.40	681.65	124.40	61.08	11.67	75.00%
Resin	9.10	35.00%	0.00%	35.00%	0.00%	60.00%	7.00%	170.0000	1.00	3.2	3.19	108.29	2598.96	474.31	220.22	5.59	95.00%
Bonding Putty	8.00	19.00%	0.00%	19.00%	0.00%	81.00%	0.10%	5.4563	1.00	1.5	1.52	0.04	1.05	0.19	0.00	1.88	100.00%
Assembly Cleaning (1)	11.15	100.00%	0.00%	100.00%	0.00%	0.00%	N/A	0.0437	1.00	11.2	11.15	0.49	11.69	2.13	0.00	N/A	75.00%
Super Flush	8.86	100.00%	0.00%	100.00%	0.00%	0.00%	N/A	1.0913	1.00	8.9	8.86	9.67	232.05	42.35	0.00	N/A	75.00%
Total State Potential Emissions:												**218.81**	**5251.47**	**958.39**	**405.56**		

Federal Potential Emissions (controlled):

	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Federal Potential Emissions:	0.00%	90.00%	**218.81**	**5251.47**	**958.39**	**40.56**

Note:
(1) Assembly cleaning is done using only methylene chloride, which is a HAP, but not a VOC.
The resin and gel coats are mutually exclusive.

Methodology:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential VOC Pounds per Hour (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Emission Factor
Potential VOC Pounds per Day (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Emission Factor
Potential VOC Tons per Year (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Emission Factor
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Sum of worst case coatings and solvents used
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)
Emission Factors are based on new AP42 factors which were taken from the "CFA Emission Models for the Reinforced Plastics Industries", February, 1998.

Appendix A: Emission Calculations
VOC Emissions
From Foam Blowing Operation

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Operation Permit No.: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 26, 1998

Potential Uncontrolled Emissions:

Material	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Potential VOC pounds per hour	Potential VOC tons per year
Flotation Foam	P2-2	10.35	100.00%	0.00%	100.00%	13.2	1.3	13.19	57.79
Total Potential Emissions:								**13.19**	**57.79**

P2-2 Material Usage Limitation	Limited VOC Emissions (pounds per hour)	Limited VOC Emissions (tons per year)
41.53%	5.48	24.00

Note:

At a 41.53% material usage limitation, VOC emissions are limited to 24 tons per year, therefore, 326 IAC 8-1-6 does not apply.

Methodology:

Weight % Organics = Weight % Volatiles - Weight % Water

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Volatile

Potential VOC Tons per Year = Pounds of VOC per hour * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions - Potential to Emit

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Operation Permit No.: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 9, 1999

Potential To Emit

Material	Process	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Weight % Toluene	Weight % Methylene Chloride	Weight % Styrene	Weight % Methyl Methacrylate	Weight % MDI	Emission Factor	Material Usage Limitation	Source Wide Material Usage Limitation	Toluene Emissions (tons/yr)	Methylene Chloride Emissions (tons/yr)	Styrene Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	MDI Emissions (tons/yr)
Adhesive Application																	
Con-Bond 2725T1	P1-1	6.80	0.546	1.00	24.10%	0.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	0.89	0.00	0.00	0.00	0.00
Titeco TTCGP1-40	P1-1	7.70	0.540	1.00	0.00%	50.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	0.00	2.06	0.00	0.00	0.00
Con-Bond 2725T1	P2-1	6.80	1.910	1.50	24.10%	0.00%	0.00%	0.00%	0.00%	N/A	51.52%	22.62%	2.40	0.00	0.00	0.00	0.00
Con-Bond 2725T1	P3-1	6.80	0.728	1.00	24.10%	0.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	1.18	0.00	0.00	0.00	0.00
Fiberglass Layup																	
Gray Gel Coat	P2-3	9.97	1.4551	1.50	0.00%	0.00%	42.21%	0.00%	0.00%	24.20%	100.00%	22.62%	0.00	0.00	5.22	0.00	0.00
White Gel Coat	P2-3	10.44	5.4565	1.50	0.00%	0.00%	35.60%	10.00%	0.00%	27.70%	100.00%	22.62%	0.00	0.00	23.45	8.47	0.00
Resin	P2-3	9.10	95.3846	1.50	0.00%	0.00%	35.00%	0.00%	0.00%	7.00%	100.00%	22.62%	0.00	0.00	90.30	0.00	0.00
Super Flush	P2-3	8.86	0.7275	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	0.00	0.00	0.00	0.00	0.00
White Gel Coat	P3-2	10.44	9.8213	1.00	0.00%	0.00%	35.60%	10.00%	0.00%	27.70%	100.00%	22.62%	0.00	0.00	10.02	10.16	0.00
Resin	P3-2	9.10	170.0000	1.00	0.00%	0.00%	35.00%	0.00%	0.00%	7.00%	100.00%	22.62%	0.00	0.00	37.55	0.00	0.00
Bonding Putty	P3-2	8.00	5.4563	1.00	0.00%	0.00%	19.00%	0.00%	0.00%	0.10%	100.00%	22.62%	0.00	0.00	0.01	0.00	0.00
Assembly Cleaning (1)	P3-2	11.15	0.0437	1.00	0.00%	100.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	0.00	0.48	0.00	0.00	0.00
Super Flush	P3-2	8.86	1.0913	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	100.00%	22.62%	0.00	0.00	0.00	0.00	0.00
Foam Blowing																	
Flotation Foam	P2-2	10.35	1.3	1.00	0.00%	0.00%	0.00%	0.00%	45.00%	N/A	41.53%	22.62%	0.00	0.00	0.00	0.00	2.44
													4.46	2.54	127.86	18.62	2.44

Total State Potential Emissions: 155.93

Methodology:

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb) * Material Usage Limitation * Source Wide Material Usage Limitation

Styrene emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * Emission Factor * (8,760 hrs/yr) * (1 ton/2,000 lb) * Material Usage Limitation * Source Wide Material Usage Limitation

Appendix A: Emission Calculations
Insignificant Natural Gas Combustion
MM Btu/hr 0.3 - < 10

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
CP: T085-7516
Plt ID: 085-00031
Reviewer: Trish Earls
Date: February 26, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.6	145.6

Heat Input Capacity includes:
heaters with a total heat input of 16.625 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.87	0.87	0.04	7.28	0.42	1.53

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name:	Rinker Boat Company, Inc.
Source Location:	300 West Chicago Street, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3732
Operation Permit No.:	T085-7516-00031
Permit Reviewer:	Trish Earls/EVP

On December 11, 1997, the Office of Air Management (OAM) had a notice published in the Times Union, Warsaw, Indiana, stating that Rinker Boat Company, Inc. had applied for a Part 70 Operating Permit to operate a fiberglass boat building and repairing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.

3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15**, as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential~~, the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

5. Section B.11 (a) has been revised and Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits. The revised condition B.11 now reads as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was **based on** continuous or intermittent **data**;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~

(5) Any insignificant activity that has been added without a permit revision; and

~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

7. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that** ~~either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

(2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~ **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**

~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

11. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

12. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. Condition C.1 is revised to change the overall source to an amount “less than” the applicable limit.

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC is limited to ~~249~~ **less than 250** tons per ~~365 consecutive day period~~ **year**. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential ~~emissions~~ **to emit** to 250 tons per ~~twelve (12) consecutive month period,~~ **year** from ~~the equipment covered in this permit,~~ **this source,** shall ~~require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~ **cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.**

15. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.2 (now renumbered as C.3) (Opacity) has been revised as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible Emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ **in any one (1) six (6) minute averaging period** ~~in twenty-four (24) consecutive readings~~, as determined in 326 IAC 5-1-4.

(b) ~~Visible Emissions~~ **Opacity** shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)**, in a six (6) hour period.

17. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised to clarify the requirement.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

18. Condition C.7 (now re-numbered C.8) (Stack Height) has been revised to clarify the requirement.

C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

~~(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

19. Conditions C.8 (Asbestos Abatement Projects-Accreditation) and C.13 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

20. Condition C.9 (now re-numbered C.10) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.10 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

(a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. Condition C.10 (now re-numbered C.11) (Compliance Schedule) has been revised to more closely match the rule language.

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

22. Condition C.11 (now re-numbered C.12) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

23. Condition C.12 (now re-numbered as C.13) (Monitoring Methods) has been revised to clarify the requirement.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

24. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

25. Condition C.16 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5~~(3)~~] **[326 IAC 2-7-6] [326 IAC 1-6]**

26. Condition C.17 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5] [326 IAC 2-7-6]**

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. Condition C.18 (a) has been revised to clarify the certification requirement for the emission statement.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit a**n** ~~certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6,** that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

28. Condition C.20 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~][**326 IAC 2-7-6]**

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative, ~~for a minimum of three (3) years~~. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

29. Condition C.21 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. The facility description box in all D Sections is revised to include the rule citation:

Facility Description [326 IAC 2-7-5(15)]

31. The Certification Form is revised to clarify which forms require a certification.

32. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.

33. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~**9** Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_x, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Rinker Boat Company, Inc.
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
Part 70 Permit No.: T085-7516-00031

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations".~~ **in the box marked "No deviations occurred this reporting period".**

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: ~~LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:~~

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	**~~No~~ ~~Deviations~~**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

On January 12, 1998, Marjorie Fitzpatrick submitted comments on the proposed Part 70 Operating Permit on behalf of Rinker Boat Company, Inc. The summary of the comments and corresponding responses is as follows:

Comment #1

In items A.2(3), (4), and (5), HPLV application system should be low pressure - high volume application system.

Response #1

Items (3), (4), and (5) of Condition A.2, page 5 of 41, and Section D.1, page 29 of 41, of the Part 70 Operating Permit, and items (1), (2), and (3) under the Unpermitted Emission Units and Pollution Control Equipment section of the TSD, page 1 of 11, have been revised as follows (changes in bold):

(3) one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a **high volume - low pressure (HVLP)** spray application system, coating a maximum of 1.0 set of boat parts per hour;
(4) one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an **HVLP** spray application system, coating a maximum of 1.5 sets of boat parts per hour;
(5) one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an **HVLP** spray application system, coating a maximum of 1.0 set of boat parts per hour;

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(1) one (1) upholstery glue application area (ID No. P1-1), located in Plant 1, using a **high volume - low pressure (HVLP)** spray application system, coating a maximum of 1.0 set of boat parts per hour;
(2) one (1) assembly glue application area (ID No. P2-1), located in Plant 2, using an **HVLP** spray application system, coating a maximum of 1.5 sets of boat parts per hour;
(3) one (1) assembly glue application area (ID No. P3-1), located in Plant 3, using an **HVLP** spray application system, coating a maximum of 1.0 set of boat parts per hour;

There are no changes to the operation conditions and status of the permit due to this change.

Comment #2

Condition B.11 of the draft Permit requires that an annual compliance certification be submitted by July 1 of each year covering the time period from January 1 to December 31 of the previous year. It is our belief that the first annual compliance certification will be due July 1, 1999, covering the period January 1 to December 31, 1998, the first year that the Permit will be in effect. Please confirm this assumption.

The last sentence of Condition B.11(c), which relates to the annual compliance certification, refers to a notification signed by the responsible official. We believe that the word notification should be annual compliance certification so the sentence reads: "The ~~notification~~ ***annual compliance certification*** which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response #2

The first annual compliance certification for Rinker Boat Company, Inc. will be due on July 1, 1999, and will cover the period from January 1 to December 31, 1998. See item No. 5 on page 2 above for the revised Condition B.11.

Comment #3

Conditions C.8 and C.13 relate to asbestos abatement projects at Rinker. This plant was constructed after 1986 and does not contain any asbestos. We request that these conditions be deleted. Item 3 listed under C.13(b) should be item C under C.13(b)(2).

Response #3

Conditions C.8 (Asbestos Abatement Projects-Accreditation) and C.13 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects). This condition is mandatory for all sources whether or not asbestos is present. The rules for asbestos demolition or renovation operations do not exempt sources from the requirements based on their construction date. Therefore, this condition will not be deleted. See item No. 19 on page 9 above for the new Condition C.8.

Comment #4

Condition C.14 requires that an Emergency Reduction Plan (ERP) be submitted within 90 days after the date of issuance of the Permit. An ERP was submitted with the Part 70 Operating Permit application. Please verify that this plan satisfies the requirements of Condition C.14.

Response #4

Since an Emergency Reduction Plan was submitted with the Part 70 Operating Permit application, condition C.14 of the permit, page 22 of 41, is revised to read as follows (changes in bold):

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Management~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days after the date of issuance of this permit.~~

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.~~

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Comment #5

Condition C.16 requires that a compliance monitoring plan (CMP) be submitted, including a Compliance Response Plan (CRP). The CRP must be prepared within 90 days of the issuance of the Permit. The Part 70 Operating Permit application includes a CMP that was prepared following the guidance form the Indiana Department of Environmental Management (Department) that was available at the time the application was being prepared. The requirements identified under Condition C.16, such as including all of the compliance monitoring and compliance determination requirements of Section D of the Permit and the record keeping requirements found in Sections C and D of the Permit in the CRP, appear to go beyond the original guidance issued by the Department for preparing CMPs. Additionally, the requirement in Condition C.16 to include a CRP appears to be a new requirement from the original guidance. It is our understanding that the original intention of the CMP was to cover emission units similar to those units addressed by the U.S. Environmental Protection Agency's (EPA's) Compliance Assurance Monitoring rule, which would not be applicable for all of the emission units at the facility. Please verify the intention of Condition C.16 and if new guidance has been issued by the Department on the preparation of CMPs and CRPs, please provide copies of these documents.

Response #5

Condition C.16 of the Part 70 Operating Permit requires that the Permittee implement a compliance monitoring plan such that reasonable information is available to evaluate the source's continuous compliance with applicable requirements pursuant to 326 IAC 2-7-5(3). As stated in the condition, the compliance monitoring plan is comprised of Condition C.16, the Compliance Determination and Compliance Monitoring requirements in Section D, and the Record keeping and Reporting requirements in Sections C and D of the Part 70 Operating Permit. The Permittee is not required to submit another Compliance Monitoring Plan. However, the Permittee must prepare a Compliance Response Plan (CRP) within 90 days after issuance of this permit which contains the information specified in Condition C.16(5) to be submitted to IDEM, OAM upon request. There are no changes in the operation conditions or status of the permit.

Comment #6

Condition C.19(b), relating to alternatives to observations, sampling or monitoring is not clear. It appears as though the Department is asking for the Permittee to either record that the equipment is shut down or perform the observations, monitoring, etc. as required by the permit on equipment that is not operating. Is this a correct interpretation of the intention of the condition?

Response #6

The intention of Condition C.19(b) is that for equipment that is not operating, the Permittee shall either record that the equipment is shut down in place of performing the observations, sampling, maintenance procedures, and record keeping of subsection (a) of the condition, or the Permittee shall perform the observations, sampling, etc. on the equipment even though it is not operating. The results of the monitoring data would most likely indicate that the equipment is not operating. There are no changes in the operation conditions or status of the permit.

Comment #7

Condition C.20 details the record keeping requirements of 326 IAC 2-7-5(3)(B). Condition C.20(c)(4) outlines record keeping requirements for preventive maintenance. The information required by this condition is not included in 326 IAC 2-7-5(3)(B). It appears that either Condition C.20(c)(4) is not in the correct location of the Permit or the regulatory reference for this condition needs to be revised.

Response #7

The purpose of Condition C.20(c)(4) is to allow the Permittee to demonstrate that if a violation of any limitation on emissions or potential to emit occurs, it was not due to improper maintenance of equipment by the Permittee. The information required in 326 IAC 2-7-5(3)(B), is the minimum record keeping required in each Part 70 permit. The records required in item (c)(4) of Condition C.20 are additional records to evaluate continuous compliance with the applicable requirements in keeping with 326 IAC 2-7-5(3). See item No. 28 on page 13 above for the revised condition.

Comment #8

Condition C.21(f) requires that reports (quarterly) cover the period commencing on the date of issuance of the Permit and ending on the last day of the reporting period. For the purposes of quarterly reporting, we are assuming that the report period ends on a calendar quarter and not at the end of the 90 day period from the issuance of the Permit. Please verify that this is correct, i.e., please identify the reporting period for quarterly reporting. Record keeping for the plant would be greatly streamlined if reporting could continue on a calendar quarter basis and not an arbitrary “quarter” created by the day the Permit is issued.

Response #8

Quarterly reporting is done on a calendar quarter basis. Therefore, the first quarterly report would cover the period commencing on the date of issuance of the Permit and ending on the last day of the calendar quarter. There are no changes in the operation conditions or status of the permit.

Comment #9

In Condition D.1.1(a), we believe that the first sentence should be changed to “Total VOC ~~usage in~~ ***emissions from*** each of the assembly glue application...”.

Response #9

The OAM has determined that rolling monthly limits will no longer be truncated to 11/12ths of the limit. Therefore, the 22 ton per year rolling monthly limit will be changed to a limit of less than 25 tons per year. In order for compliance with this limit to be demonstrated on a twelve (12) month rolling average, the limit must be expressed as a production limit, which places restrictions on a source's rate of material throughput. Therefore, the limit on VOC is expressed as a limit on VOC usage. The limit will be also be revised to clarify the relationship between VOC usage and VOC emissions. In both the assembly glue application area and the floatation foam blowing operation VOC usage is assumed to be equivalent to VOC emissions. Condition D.1.1(a) of the Part 70 Operating Permit, page 29 of 41, is revised to read as follows (changes in bold):

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Total VOC usage in each of the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall ~~not exceed~~ **be limited to less than 25.0** tons per 12 consecutive month period, rolled on a monthly basis. **This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the assembly glue application area and the flotation foam blowing operation.** Compliance with this limit makes 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable.

The Quarterly Report forms for the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) have been revised to express the VOC limit as noted above. Also, the compliance monitoring requirements for the assembly glue application area and the flotation foam blowing operation in the Compliance Requirements section of the TSD have been revised as follows (changes in bold):

(1) The assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) have applicable compliance monitoring conditions as specified below:

(a) Total VOC usage in each of the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall not exceed **25.0** tons per 12 consecutive month period, rolled on a monthly basis;
(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage for each of the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2).

These monitoring conditions are necessary to render the requirements of 326 IAC 8-1-6 (BACT) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

Comment #10

Condition D.1.2 specifies the total VOC emission limitation to avoid Prevention of Significant Deterioration (PSD) requirements. The second sentence from the end of this condition ("This emission limit is based on...") identifies, in part, the assumptions used to estimate emissions from some of the operations at the plant. We believe that this sentence should be deleted; the applicable limitations are the annual emission limits for the plant for which compliance will be determined through record keeping and reporting. The information in this sentence is not part of any previous requirements for the plant.

Response #10

The resin and gel coat emission calculations from the fiberglass layup operations were revised using the new emission factors from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. Instead of using a flash off factor based on the type of resin or gel coat used, the new emission factors are determined based on the weight percent of styrene monomer present in the resin or gel coat. The emission factor represents the weight percent of resin or gel coat that is emitted as styrene (which is a VOC and a HAP). The new emission factors resulted in an increase in potential VOC and HAP emissions from the fiberglass layup operations. However, this did not result in any changes in the rule applicability for the fiberglass layup operations. The emission calculation spreadsheets have been revised to incorporate the new emission factors. Since there are many types of fiberglass layup operations, and several different emission factors for resins and gel coats, the assumptions used to calculate emissions from the fiberglass layup operations are necessary so that the records of resin and gel coat usage can be correlated to VOC emissions in the same manner in which the potential emissions were calculated. If the fiberglass layup operations are changed and different emission factors are used, they should be specified. Condition D.1.2 has been revised to include the new emission factors as follows (changes in bold or strikeout):

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

~~Total emissions of VOC~~ **Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators** in each of the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall ~~not exceed~~ **be limited such that the potential to emit (PTE) VOC from these operations shall be limited to** 246.2 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of 249.0 tons per 365 consecutive day period (includes 246.2 tons per year from the significant activities and 2.8 tons per year from the insignificant activities). ~~This emission limit is based on 35% flash off for non vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup in the fiberglass layup operations.~~ **Compliance with this limit shall be determined based upon the total VOC usage in the upholstery glue application area, the two (2) assembly glue application areas, and the foam blowing operation, and the following criteria for the two (2) fiberglass layup operations:**

(a) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

The Quarterly Report form for the source wide VOC emission limit has been revised to state the emission limit as noted above. Also, the compliance monitoring requirements for the source wide VOC emission limit in the Compliance Requirements section of the TSD have been revised as follows (changes in bold or strikeout):

(2) The fiberglass layup operation (ID No. P2-3), located in Plant 2, the fiberglass layup operation (ID No. P3-2), located in Plant 3, the upholstery glue application area (ID No. P1-1), located in Plant 1, the assembly glue application area (ID No. P2-1), located in Plant 2, the assembly glue application area (ID No. P3-1), located in Plant 3, and the foam blowing operation (ID No. P2-2), located in Plant 2, have applicable compliance monitoring conditions as specified below:

(a) ~~Total emissions of VOC~~ **Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators** in each of the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall ~~not exceed~~ **be limited such that the potential to emit (PTE) VOC from these operations shall be limited to** 246.2 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of 249.0 tons per 365 consecutive day period (includes 246.2 tons per year from the significant activities and 2.8 tons per year from the insignificant activities). ~~This emission limit is based on 35% flash off for non vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup in the fiberglass layup operations.~~ **Compliance with this limit shall be determined based upon the total VOC usage in the upholstery glue application area, the two (2) assembly glue application areas, and the foam blowing operation, and the following criteria for the two (2) fiberglass layup operations:**

(i) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(ii) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total daily VOC emissions for each of the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2).

These monitoring conditions are necessary to render the requirements of 326 IAC 2-2 (PSD) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

Comment #11

Condition D.1.9(a) requires daily observations to be made of the overspray while one or more of the booths are in operation to monitor the performance of the dry filters. Please provide additional guidance on specifically what is being observed about the overspray and how the observations on overspray will impact the efficiency of the filters. The procedures described in Condition D.1.9(b) appears to be a more effective means of determining the effectiveness of the filters. We believe Condition D.1.9(a) should be dropped.

Response #11

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for spray booths. The actual substrate being coated and the solids content of the coating being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the spray booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Condition D.1.9, of the Part 70 Operating Permit, page 31 of 41, now reads as follows:

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the fiberglass layup booth stacks (S2-1, S2-2, S3-1, and S3-2)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment #12

Condition D.1.10 specifies the record keeping requirements for VOC-emitting emission units at the plant. The requirements of this section appear to treat the emission units as coating or printing lines under 326 IAC 8, which is not the case; this is a reinforced plastics/composites operation. Under the current operating permit, production rate (boats produced) is used as the mechanism for tracking compliance with the facility-wide emission cap based on correlations between emissions and production rates. We believe that this is still a valid method for tracking ongoing compliance with the annual emission cap. Any significant changes to the manner of production of the boats, i.e. changes that would increase emissions, would still need to be registered or permitted with the Department and changes to the reporting mechanism could be evaluated at that time. At the present time, Rinker tracks production on a weekly basis, but as we discussed several months ago, they can change this to a daily basis to more closely track ongoing compliance with the VOC emission cap. For your information, a copy of the current reporting form is included in Attachment A. Therefore, the following is proposed to replace Condition D.1.10:

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) A log of the number of boats produced at each plant on a daily basis;

(2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), record the amount and VOC content of the materials used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response #12

Since VOC emissions were based on the boats produced per hour, it is acceptable to maintain records of boats produced on a daily basis to track compliance with the VOC emission limit. Monthly records of the materials used in the fiberglass layup operation should be sufficient to further confirm compliance with the VOC emission limit. Since the VOC emission limits for the glue application area and the flotation foam blowing operation are monthly rolling limits, monthly records of material usage for those operations is sufficient to track compliance with their respective VOC limits. Condition D.1.10 of the permit is revised to read as follows (changes in bold):

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through **(2)** below. Records ~~maintained for (1) through (6) shall be taken daily and~~ shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) For Plants 2 and 3 the following records shall be maintained:

(i) A log of the number of boats produced in Plants 2 and 3 on a daily basis;

(ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(iii) The cleanup solvent usage for each month;

(iv) The total VOC usage for each month; and

(v) The weight of VOCs emitted for each compliance period.

(2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), the amount and VOC content of each material and solvent used shall be recorded on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment #13

Condition D.2.2 requires testing for particulate matter (PM) and PM_{10}. Rinker believes that compliance can adequately be demonstrated through the visible emission notation requirements under Condition D.2.4. This is a small source of particulate matter and is not located in a particulate matter nonattainment area. Also, as is typical for cyclones in this type of service, the cyclone exhaust has a short stack with a large diameter so that locating sampling ports in accordance with EPA Reference Methods is not possible. Although a temporary extension on the stack can be installed, we believe that it is still likely that there will be cyclonic flow at the sampling point due to the nature of the operation. Additionally, since there are no applicable emission requirements for PM_{10} emissions, it is not clear why sampling PM_{10} is necessary. Therefore, because of the low emission rate from the source and the inherent difficulties anticipated in sampling a short, wide stack with cyclonic air flow, we believe that emission testing of this stack should not be required and request that Condition D.2.2 be deleted.

Response #13

The PM emission calculations for the woodworking operation were based on a cyclone overall control efficiency provided by the manufacturer and the amount of sawdust typically removed from the cyclone hopper. Since these emissions can be verified without stack testing by again measuring the amount of sawdust removed from the cyclone hopper and using the manufacturer's specified control efficiency to determine the outlet emission rate, and because of the difficulties that would be encountered due to the expected cyclonic flow in the cyclone exhaust stack, stack testing for PM will not be required in the permit. Also, since there is no PM_{10} emission limit specified in the permit, the PM_{10} stack testing requirement will also be removed. Therefore, condition D.2.2 is revised to read as follows (changes in bold):

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

~~During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Note: Condition D.1.6 of the Part 70 Operating permit was also revised to include the new model permit language shown above.

Comment #14

Pages 36 and 37 of 41 of the Permit include a "Part 70 Operating Permit Emergency/Deviation Occurrence Report" form. The last item on page 2 of the form states that a signed certification is needed to complete the report. Condition B.13 of the Permit, relating to emergency provisions, states that the emergency notification requirements do not need to be signed by a responsible official. Condition B.16 relating to reporting Permit deviations, is silent on this certification issue as are the Department's regulations related to this notification requirement. Therefore, we do not believe that a certification by a responsible official is required when submitting this form. Please clarify this or indicate if the certification form can be signed by someone else at the plant when submitting this form.

Response #14

The Emergency/Deviation Occurrence Report is for the Permittee to notify IDEM, OAM of any emergencies or deviations from permit requirements. Since emergency notification does not require certification by the "responsible official" as defined in 326 IAC 2-7-1(34), the certification, which must accompany the report, can be signed by any of the plant personnel.

Comment #15

Pages 38 and 39 of 41 of the Permit include quarterly report forms. We suggest adding "QUARTER:_____" next to the "YEAR:_____" data field that is just above the table in the center of each form. This will allow for complete identification of the year and quarter that is being reported. The form on page 40 of 41 should be revised to correspond with the request to monitor boat production on a daily basis as discussed above.

Response #15

The additional data field for identification of the quarter has been added to the quarterly report forms on pages 38 and 39 of 41 as requested. For further clarification of the months being reported, it is suggested that the specific months be listed in the rows of the Month column. The quarterly report form on page 40 of 41 remains unchanged because the VOC emission limit covers the entire source, and listing the boat production in Plants 2 and 3 would not indicate the total source wide VOC emissions. The boat production will be monitored for record keeping purposes only to help track compliance.

Comment #16

Page 41 of 41 includes a form for reporting quarterly compliance. The heading on the table on this form asks for a "list of each compliance requirement existing for this source." Please clarify if it is the Department's intention to include all permit conditions for this plant on this form or to simply list the requirements with the deviations.

Response #16

This form is to document continuous compliance with all permit requirements in section D.1 and D.2 of this permit. All section D.1 and D.2 permit requirements must be listed and it must be indicated if there were any deviations from these requirements. There are no changes in the operation conditions or status of the permit.

Comment #17

The existing Operating Permit (CP 085-2400-00031) covers the buildings referred to as Plants 2 and 3. The "Unpermitted Emission Units and Pollution Control Equipment" section on Page 1 of the TSD includes two glue assembly areas (ID Nos. P2-1 and P3-1) and a foam blowing operation (ID No. P2-2) which are part of Plants 2 and 3. Although the current operating permit does not specifically identify these emission units, the permit does cover buildings at Plants 2 and 3. These emission units were identified, with a clarifying footnote in the Permit application on Form GSD-01, Section K related to limited liability. This was done essentially as a "belt and suspenders" approach to make sure that these emission units were covered by the limited liability policy related to unpermitted emission sources. Since we do not believe that these permits violated the permit requirements, we do not believe that they should be listed as unpermitted under the "Unpermitted Emission Units and Pollution Control Equipment" and "Enforcement Issues" sections of the TSD.

Response #17

Based on the permit application on file for CP-085-2400-00031, issued January 29, 1993, no information on the two glue assembly areas (ID Nos. P2-1 and P3-1) or the foam blowing operation (ID No. P2-2) were included for Plant 2 or Plant 3. Therefore, these facilities were not included in the Construction Permit. These units, which meet the criteria to be eligible for Limited Liability, will remain listed under the "Unpermitted Emission Units and Pollution Control Equipment" and "Enforcement Issues" sections of the TSD.

Comment #18

The potential particulate matter emissions shown in Appendix A appear quite high for the application of the resin, especially for Units P2-3 and P3-2. The transfer efficiency should actually be approximately 95 percent. This is not a surface coating operation and the resin is actually sprayed into a mold, producing a high transfer efficiency. Additionally, due to the size of the material, a portion of the overspray settles out onto temporary coverings on the floor which are replaced on a weekly basis. This settled material should not be considered in determining potential emissions because this material is too large to become airborne.

Response #18

Based on manufacturer's test data provided by Marjorie Fitzpatrick on behalf of Rinker Boat Company on February 11, 1998, the transfer efficiency used to calculate particulate matter emissions from the resin spray layup operations have been revised from 75% to 95%. Also, due to the use of new emission factors to calculate emissions from resin and gel coat application, the emission calculations for the fiberglass layup operations have been changed. The new emission factors resulted in an increase in potential VOC and HAP emissions from the fiberglass layup operations. The emission calculation spreadsheets have been revised to incorporate the revised transfer efficiency and the revised emission factors. The Limited Potential to Emit section of the TSD is also revised to show the revised emissions from the fiberglass layup operations as follows:

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Fiberglass Layup, Adhesive Application, and Foam Blowing(1)	11.3	11.3	0.0	246.2	0.0	0.0	155.9
Woodworking(1)	8.2	8.2	0.0	0.0	0.0	0.0	0.0
Total Emissions(2)	20.4	20.4	0.0	249.0	1.5	7.3	155.9

(1) The unpermitted adhesive application operations (ID Nos. P1-1, P2-1, and P3-1), the unpermitted foam blowing operation (ID No. P2-2), and the unpermitted woodworking operation (ID No. P1-2) are being reviewed under the ENSR process. Potential VOC emissions from the unpermitted facilities, except woodworking are greater than 25 tons per year, and potential PM emissions from the woodworking operation are greater than 25 pounds per day, therefore, these facilities would have required a permit or a registration. The ENSR process will satisfy the requirements of the construction permit rules.

(2) Includes emissions from Insignificant Activities.

Comment #19

Since the Part 70 Permit Application was originally submitted, the fiberglass layup operation in Plant 4 has been demolished and removed from the source. In its place is a research and development building, which is still identified as Plant 4, which should be listed as an Insignificant Activity in the TSD. Please make the necessary revisions to the Part 70 Operating Permit.

Response #19

All references to the fiberglass layup operation (ID No. P4-1), previously located in Plant 4, has been removed from the permit and the "Unpermitted Emission Units and Pollution Control Equipment" section of the TSD. The research and development building which has replaced the fiberglass layup operation has been added as item no. 18 to the list of Insignificant Activities in the Insignificant Activities section of the TSD. The additional item 18 now reads as follows:

(18) one (1) research and development building, identified as Plant #4.

The "Enforcement Issues" section of the TSD has also been revised to include new model TSD language and now reads as follows:

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.